



Supplier code of conduct

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Presentation

For Emtelco S.A.S., in our continuous effort to be leaders in our markets, we demand high levels of excellence from ourselves, from our managers and employees, also from our suppliers and partners. Under this high performance, we demand high ethical standards.

1. Purpose

Emtelco S.A.S. is committed to creating value for its stakeholders within a framework of corporate sustainability in which ethics, transparency, and respect for the law are fundamental pillars for creating trust relationships with suppliers and all other stakeholders.

In accordance with this company philosophy, Emtelco S.A.S. has established the "Supplier Code of Conduct," which outlines the responsible business practices that the organization requires its providers to take on.

The terms of this Code of Conduct for suppliers are intended to complement, but not substitute, the terms of any contract between Emtelco and its suppliers.

2. Scope

Emtelco's Supplier Code of Conduct must be accepted and fulfilled by our Suppliers in order to incorporate responsible business practices and ensure fulfillment of legal requirements.

3. Definitions

3.1 Emtelco

This name refers to the following company, Emtelco S.A.S.

3.2 Suppliers

They are defined as supplier(s), contractor (s), distributor(s), consultant(s), and/or other third parties who provide goods or services to support Emtelco S.A.S.

4. Commitments of suppliers

4.1 Business ethics and responsible business practices.

Suppliers must commit to the highest standards of ethical conduct and responsible business practices. The promotion of business ethics and the fight against bribery and corruption are fundamental practices for doing business with our company. They are also key elements for sustainability and long-term relationships.

4.1.1 Business ethics, anticorruption, and anti-bribery.

All suppliers commit to fulfilling article 16 of Colombian Law 1474 of 2011 – Anticorruption Statute, which establishes that in the context of the contract there must be no undue payments for the benefit of any of the parties involved, and there must also be no benefits to any public authority that may affect proper decision-making within its responsibility.

Corruption, bribery, and extortion are strictly forbidden in Emtelco, through our zero tolerance principle regarding bad business practices. Therefore:

- Emtelco S.A.S. abstains from doing business with suppliers who are involved with bad practices that affect business ethics, such as: corruption, bribery, and extortion, among others.
- Suppliers shall not participate in bribery or offer or accept payments or other means in order to obtain undue advantages for or from Emtelco S.A.S.
- Suppliers must commit to establishing and implementing anti-bribery and anticorruption practices within their organization and with third parties.
- Refrain from establishing relationships with illegal groups or social actors that are outside the constitution and the law, and have adequate control mechanisms to prevent the materialization of risks related to the laundering of assets, Financing of terrorism, fraud and corruption. If you are obliged to have a system for the prevention of the laundering of assets and the financing of terrorism, comply with the regulations in force in accordance with the applicable law.

Any attempt at violating these requirements by suppliers will be grounds for termination of the their contract with Emtelco S.A.S.

4.1.2 Gifts and hospitality.

Emtelco S.A.S. Code of Ethics and Gifts and Hospitality Policy prohibits its employees from requesting or accepting money, objects, or leisure activities or maintaining special treatment with any current or potential supplier. As such, suppliers must abstain from offering and/or giving money or gifts, including leisure activities, to Emtelco S.A.S. employees and/or their families.

4.1.3 Fraud, money laundering and financing terrorism.

Suppliers must act against fraud, prevention of money laundering, and financing terrorism. They must document and implement a compliance program against money laundering and financing terrorism which includes mechanisms to prevent and detect these bad practices.

4.1.4 Protection of confidential information.

Suppliers may receive or have access to confidential information created by business activities or in fulfillment of their contract with Emtelco, such as: strategic business plans, budgets, client databases, and employees' personal information, among others.

Said information must be handled confidentially and shall only be provided as is necessary in accordance with fulfillment of the agreed-upon relationship.

Said information may only be shared within the terms indicated in the conditions of the bid, contract, and purchase order.

4.1.5 Intellectual property rights.

Suppliers must respect intellectual property rights, independently of the existence of any pertinent legislation or regulation in force.

Suppliers must not advertise contracts signed with Emtelco S.A.S. and when this is necessary, they must request prior authorization from Emtelco S.A.S.

4.1.6 Fair business practices

Suppliers must respect regulations regarding fair business, advertising, and competition practices, thereby ensuring that the information provided to clients is not misleading

4.1.7 Fulfillment of tax obligations

Suppliers must fulfill their tax obligations in accordance with applicable legislation

4.2 Worker's rights

Emtelco S.A.S. suppliers are expected to protect the human rights of their employees and third parties, and to treat them with decency and respect. The following aspects shall be considered:

4.2.1 Universal Human Rights

Suppliers must respect and promote human rights as defined in the "Universal Declaration of Human Rights" and the "Agreements of the International Labor Organization" and must ensure they will not cause the violation of any human rights, nor benefit from violations committed by any other person or organization.

4.2.2 Decent and respectful treatment

Suppliers must treat all employees with decency and respect, and must guarantee that workers are not the object of mistreatment, threatening behavior, or any type of inhuman treatment, including corporal punishment, physical or verbal abuse, sexual harassment, or any other kind of abuse or intimidation.

4.2.3 Involuntary labor

Suppliers may not use any form of forced labor, such as: slavery or labor produced by human trafficking or prisoners. The employees and contractors of Emtelco S.A.S. suppliers must be free to leave their jobs or end their work contracts and must never withhold workers from their identification documents or work permits.

4.2.4 Working hours

Suppliers must respect local and international laws regarding weekly working hours, including laws related to the maximum overtime hours applicable to their legislation and in accordance with regulations set forth by international organizations, such as the ILO – International Labor Organization

4.2.5 Salaries, social benefits, and parafiscal obligations

Suppliers must guarantee that their workers will be paid on time and at a rate equal to or greater than the legal minimum wage in force. They must likewise guarantee payment of all other applicable labor obligations in accordance with legislation in their place of operation.

4.2.6 Equal opportunity and discrimination

Suppliers must not participate in or support practices of discrimination and must promote equal opportunity regardless of race, ethnic origin, religion, political affiliation, sexual orientation, age, gender, or marital status.

Suppliers must recognize the added value of diversity in the workplace and encourage work among underrepresented groups (such as women, minorities, disabled persons, etc.).

4.2.7 Wellbeing and privacy of information

Suppliers shall abstain from requesting unnecessary information regarding the health of current or potential workers. If for any reason this information is known, it must be handled confidentially in accordance with the law of habeas data or any other law that complements or replaces it.

Suppliers must give their employees proper sanitary working conditions that guarantee their health conditions.

4.2.8 Freedom of association

Emtelco S.A.S. respects the right of workers to be affiliated to a union of their choosing without suffering any type of discrimination, intimidation, or harassment and therefore demands that its providers respect the same freedom in accordance with applicable laws.

4.3 Protection of workers

4.3.1 Protection from occupational hazards

Suppliers must promote safety in the workplace for its employees. Therefore, they must:

- Comply with applicable regulations regarding issues of health, safety, and environmental risks in the workplace and surrounding areas.
- Identify and control all foreseeable risks regarding work activities and mitigate risks to the lowest possible level.
- Provide workers with appropriate personal protection equipment sufficient to avoid any damage or negative health effects.
- Protect their workers in the use of machinery through appropriate design and operations (physical guards, blockages, barriers, etc.) and guarantee education and preventive maintenance.
- Identify, measure, and mitigate exposure of workers to biological, chemical, and physical risks, including radio frequency fields.
- When contracts are signed which imply a high risk to physical safety for workers, Emtelco may ask for protection measures for workers as part of their presentation and contractual commitments.

4.3.2 Emergency preparedness

Suppliers must protect their workers against emergency situations, such as fires, floods, hurricanes, and earthquakes, among others, through the implementation of appropriate emergency plans, safety equipment, and evacuation procedures.

4.3.3 Work-related injuries and illnesses

Suppliers must:

- Monitor and record its workers' work-related injuries and illnesses as a preventive measure regarding worker health.
- Promote among its workers reports of work-related injuries and illnesses, and provide appropriate treatment.

4.4 Prohibition of child labor

Emtelco S.A.S. believes in and promotes the education of children and promotes it as an essential element for children's development. It is also totally against child labor. It therefore prohibits the participation of children in the operation and manufacture or execution of products and/or services that it purchases.

Suppliers may not employ anyone until they have reached the minimum age for employment in accordance with applicable legislation, and they must follow pertinent recommendations from the ILO and UNICEF regarding children's rights. This commitment must also extend to suppliers' supplier along their value chain.

Suppliers must maintain appropriate records and documents that prove the age of their workers and demand these commitments in their own supply chain.

4.5 Environmental protection

Supplier must recognize that in order to achieve sustainable development, environmental protection must be an integral part of the development process and may not be considered as a separate issue.

Therefore, supplier must strive to minimize the adverse environmental impacts of their products and services. Their production, transportation, use, and elimination or recycling processes must comply with applicable national legislation and international good practices, and in countries in which no environmental legislation exists, suppliers must guarantee reasonable practices in environmental impact management.

4.5.1 Permits and reports

When necessary, suppliers shall negotiate required permits and must comply with legislation for the development of said activities and generate reports of compliance with applicable regulations requested by entities that require them.

4.5.2 Waste reduction and treatment

Suppliers must work to reduce or eliminate waste produced by all their activities which may affect the environment.

Suppliers must appropriately reduce, treat, control, and handle liquid, solid, and water waste before dumping

4.5.3 Dangerous substances and gas emissions

Suppliers involved in their production process gases, emissions of organic chemicals, acids or corrosives, volatile aerosols, particulates, ozone-depleting gases, as well as combustion by-products, must control and treat properly such emissions with actions such as:

- Identify chemical substances and other materials that could cause damage if released into the environment through their processes and make declarations to local authorities when necessary.
- Appropriately protect and manage handling of dangerous gases and substances in order to reduce the environmental risk to the minimum.

4.5.4 Electronic and radio equipment

Some of the products acquired by Emtelco S.A.S. consist of electronic and radio equipment. During the acquisition bids for said equipment, Emtelco S.A.S. shall pay special attention to energy consumption and environmental impact throughout the product's service life.

Emtelco S.A.S. suppliers to develop products through a process that includes:

- Low energy consumption and environmental impact during their manufacture, supply, and installation.
- Low energy consumption in their operation.
- A lower content of dangerous components
- A design that facilitates reuse and recycling before elimination.

Any equipment provided by suppliers that emit electromagnetic fields (EMF) must be manufactured and tested in accordance with global safety standards according to the information set forth by the International Commission on Non-Ionizing Radiation Protection (ICNIRP), and for mobile phones within SAR safety limits.

4.5.5 Responsible supply of materials

Any supplier that manufactures with components, parts, and/or products that contain tantalum, tungsten, tin, platinum, and gold must have a policy or procedure regarding the purchase of said materials in order to ensure that the minerals purchased come from foundries and mines validated as "conflict-free."

Suppliers must act with due diligence at the source and along the chain of custody of said minerals and provide reports regarding the due diligence measures implemented and the origins of the materials in their products at the request of Emtelco S.A.S.

5. Implementing and monitoring the Code of Conduct

Suppliers shall commit to implementing and continually monitoring the requirements established in this Supplier Code of Conduct and applicable legislation for each of the issues addressed herein.

Suppliers must establish a process to document fulfillment of this Supplier Code of Conduct and bear in mind the following aspects:

- **Responsibilities identified**
Establish an organizational chart identifying functions, responsibilities, and information reporting.
- **Risk management**
Define a written plan to identify, measure, and manage associated and foreseeable risks.

- **Training**
Design and implement a plan for appropriate education to make the Supplier Code of Conduct known to its directors and workers.
- **Continuous improvement**
Identify and establish pertinent actions to ensure fulfillment of this manual.

Emtelco S.A.S. may perform audits, with prior notification, in order to verify fulfillment of the Supplier Code of Conduct. To this end, it must have access to the records and allow the right to make copies of those records.

6. Reports and complaints

Suppliers must report any case they consider to be in violation of the Supplier Code of Conduct, whether it is considered an illegal or anti-ethical conduct. Through this premise, Emtelco S.A.S. and the supplier must protect the confidentiality of those filing complaints.

Reports and complaints may be filed through the channels established by Emtelco S.A.S. which are:

- Email: línea-etica@emtelco.com.co
- Ethical phone line: 018000517871
- Emtelco S.A.S. company webpages through the ethical line link.

7. Commitment and transparency

Emtelco S.A.S. and the supplier commit to aligning the requirements and fulfilling the Supplier Code of Conduct/work practices and to implementing and applying measures that guarantee good labor practices and similar ethics in accordance with the spirit of this Code.

Breach of the Supplier Code of Conduct may be considered a grave breach of contract and, therefore, Emtelco S.A.S may consider the contract terminated and reserves all rights and legal recourses related to said breach.

Emtelco S.A.S may report Supplier fulfillment with regards to this Supplier Code of Conduct in its Annual Corporate Responsibility Report.

Compliance of the Supplier Code of Conduct

With the signing of this document your company guarantees the reading, comprehension and compliance of the practices described in this code of conduct of suppliers, as well as has been informed by Emtelco S.A.S. on the obligation to comply with the rules related to the Prevention of transnational bribery and who knows the business ethics program and the consequences of infringing it.

In conformity sign is signed the day __, month __, year __ by the Legal representative of the supplier.

Name: _____ Identification: _____

Signature: _____

Company: _____ Nit: _____

Certify that you received, read and understood the provider code of conduct, and to demonstrate that you are committed to complying with its terms and conditions



[Click here](#)

8. Validity

Supplier Code of Conduct

This code governs from the date of its publication, however, Emtelco S.A.S. reserves the right to change, modify or eliminate, in whole or in part, at any time and without prior notice, unilaterally. All changes will be published and notified in the Integral Management System (SGI).

Change Control									
Version	Nature of Change	Produced by		Reviewed by		Approved by		Validity	
		Name	Charge	Name	Charge	Name	Charge		
1	Initial Version	Luis Fernando Gonzalez Rojas	Profesional RSE	Juan Ignacio Palacio	Gerente General (E)	Juan Ignacio Palacio	General Manager (E)	14/12/2015	06/11/2017
2	The concept includes transnational bribery	Luis Fernando Gonzalez Rojas	Profesional RSE	Maritza Garzón Vargas	Gerente General (E)	Comité de Auditoría	Audit Committee	07/11/2017	To date